

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

The Woodlands Pride, Inc.; Abilene  
Pride Alliance; Extragrams, LLC; 360  
Queen Entertainment LLC; Brigitte  
Bandit,

*Plaintiffs,*

*v.*

Angela Colmenero, in an official  
capacity as Interim Attorney General of  
Texas; The Woodlands Township;  
Montgomery County, Texas; Brett  
Ligon, in an official capacity as District  
Attorney of Montgomery County; City  
of Abilene, Texas; Taylor County,  
Texas; James Hicks, in an official  
capacity as District Attorney of Taylor  
County; Delia Garza, in an official  
capacity as County Attorney of Travis  
County; Joe D. Gonzales, in an official  
capacity as District Attorney of Bexar  
County,

*Defendants.*

Civil Action No. 4:23-cv-02847

**DECLARATION OF CHARELLE LETT IN SUPPORT OF PLAINTIFFS'  
REQUEST FOR JUDICIAL NOTICE**

I, Charelle Lett, hereby declare as follows:

1. I am a legal fellow with the ACLU of Texas. I graduated from law school this year and took the Texas Bar Exam this July. I am currently working under the supervision of Thomas Buser-Clancy and other licensed attorneys at the ACLU of Texas while I await my bar exam results and until I am fully licensed.

2. Along with Baker Botts LLP, the ACLU of Texas represents the Plaintiffs in the above-captioned case. The statements set forth in this declaration are based on my personal knowledge, and on information made available to me in the course of my responsibilities working on this case. If called as a witness, I could and would testify thereto. I am over eighteen years of age and of sound mind to declare to the facts stated herein.

3. I submit this declaration in support of Plaintiffs' Complaint and Motion for Temporary Restraining Order and Preliminary Injunction.

4. Filed herewith as Plaintiffs' Exhibits 1–29 are true and correct copies of the following documents that I downloaded from the indicated websites:<sup>1</sup>

Exhibit	Description
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<sup>1</sup> The videos are on the Texas Legislature's website and Plaintiffs are currently working to obtain downloadable copies to share directly with the Court before trial.

1	Senate Bill 12, Enrolled Version, <a href="https://capitol.texas.gov/tlodocs/88R/billtext/pdf/SB00012F.pdf#navpanes=0">https://capitol.texas.gov/tlodocs/88R/billtext/pdf/SB00012F.pdf#navpanes=0</a> (last accessed Aug. 22, 2023).
2	Senate Bill 12, History, <a href="https://capitol.texas.gov/BillLookup/History.aspx?LegSess=88R&amp;Bill=SB12">https://capitol.texas.gov/BillLookup/History.aspx?LegSess=88R&amp;Bill=SB12</a> (last visited Aug. 22, 2023).
3	Senate Bill 12, Authors, <a href="https://capitol.texas.gov/BillLookup/Authors.aspx?LegSess=88R&amp;Bill=SB12">https://capitol.texas.gov/BillLookup/Authors.aspx?LegSess=88R&amp;Bill=SB12</a> (last visited Aug. 22, 2023).
4	Senate Bill 12, Sponsors, <a href="https://capitol.texas.gov/BillLookup/Sponsors.aspx?LegSess=88R&amp;Bill=SB12">https://capitol.texas.gov/BillLookup/Sponsors.aspx?LegSess=88R&amp;Bill=SB12</a> (last visited Aug. 22, 2023).
5	Senate Bill 12, As Introduced/Filed Version (Mar. 10, 2023), <a href="https://capitol.texas.gov/tlodocs/88R/billtext/pdf/SB00012I.pdf#navpanes=0">https://capitol.texas.gov/tlodocs/88R/billtext/pdf/SB00012I.pdf#navpanes=0</a> (last visited Aug. 22, 2023).
6	Senate Bill 12, As-Filed Bill Analysis, Senate Research Center (Mar. 21, 2023), <a href="https://capitol.texas.gov/tlodocs/88R/analysis/pdf/SB00012I.pdf#navpanes=0">https://capitol.texas.gov/tlodocs/88R/analysis/pdf/SB00012I.pdf#navpanes=0</a> (last visited Aug. 22, 2023).
7	Senate Bill 12, Fiscal Note, Legislative Budget Board (Mar. 22, 2023), <a href="https://capitol.texas.gov/tlodocs/88R/fiscalnotes/pdf/SB00012I.pdf#navpanes=0">https://capitol.texas.gov/tlodocs/88R/fiscalnotes/pdf/SB00012I.pdf#navpanes=0</a> (last visited Aug. 22, 2023).
8	Senate Bill 12, House Committee Report (May 12, 2023), <a href="https://capitol.texas.gov/tlodocs/88R/billtext/pdf/SB00012H.pdf#navpanes=0">https://capitol.texas.gov/tlodocs/88R/billtext/pdf/SB00012H.pdf#navpanes=0</a> (last visited Aug. 22, 2023).
9	Senate Bill 12, House Committee Bill Analysis, <a href="https://capitol.texas.gov/tlodocs/88R/analysis/pdf/SB00012H.pdf#navpanes=0">https://capitol.texas.gov/tlodocs/88R/analysis/pdf/SB00012H.pdf#navpanes=0</a> (last visited Aug. 22, 2023).


10	Senate Bill 12, Conference Committee Report (May 26, 2023), <a href="https://lrl.texas.gov/scanned/88ccrs/sb0012.pdf#navpanes=0">https://lrl.texas.gov/scanned/88ccrs/sb0012.pdf#navpanes=0</a> (last visited Aug. 22, 2023).
11	Senate Bill 12, As-Enrolled Bill Analysis, Senate Research Center (June 19, 2023), <a href="https://capitol.texas.gov/tlodocs/88R/analysis/pdf/SB00012F.pdf#navpanes=0">https://capitol.texas.gov/tlodocs/88R/analysis/pdf/SB00012F.pdf#navpanes=0</a> (last visited Aug. 22, 2023).
12	Texas Senate, <i>Senate Committee on State Affairs (Part II)</i> (Mar. 23, 2023), <a href="https://tlcsenate.granicus.com/MediaPlayer.php?view_id=53&amp;clip_id=17469">https://tlcsenate.granicus.com/MediaPlayer.php?view_id=53&amp;clip_id=17469</a> (last visited Aug. 22, 2023).
13	Texas Senate, <i>Senate Session (Part II)</i> (Apr. 4, 2023), <a href="https://tlcsenate.granicus.com/MediaPlayer.php?view_id=53&amp;clip_id=17589">https://tlcsenate.granicus.com/MediaPlayer.php?view_id=53&amp;clip_id=17589</a> (last visited Aug. 22, 2023).
14	Texas Senate, <i>Senate Session (Part III)</i> (Apr. 4, 2023), <a href="https://tlcsenate.granicus.com/MediaPlayer.php?view_id=53&amp;clip_id=17593">https://tlcsenate.granicus.com/MediaPlayer.php?view_id=53&amp;clip_id=17593</a> (last visited Aug. 22, 2023).
15	Texas Senate, <i>Senate Session</i> (Apr. 5, 2023), <a href="https://tlcsenate.granicus.com/MediaPlayer.php?view_id=53&amp;clip_id=17610">https://tlcsenate.granicus.com/MediaPlayer.php?view_id=53&amp;clip_id=17610</a> (last visited Aug. 22, 2023).
16	Texas House of Representatives, <i>House Committee on State Affairs</i> (May 10, 2023), <a href="https://tlchouse.granicus.com/MediaPlayer.php?view_id=78&amp;clip_id=24841">https://tlchouse.granicus.com/MediaPlayer.php?view_id=78&amp;clip_id=24841</a> (last visited Aug. 22, 2023).
17	Texas House of Representatives, <i>House Committee on State Affairs (Part II)</i> (May 10, 2023), <a href="https://tlchouse.granicus.com/MediaPlayer.php?view_id=78&amp;clip_id=24856">https://tlchouse.granicus.com/MediaPlayer.php?view_id=78&amp;clip_id=24856</a> (last visited Aug. 22, 2023).
18	Texas House of Representatives, <i>88<sup>th</sup> Legislative Session (Par I)</i> (May 19, 2023), <a href="https://tlchouse.granicus.com/MediaPlayer.php?view_id=80&amp;clip_id=24930">https://tlchouse.granicus.com/MediaPlayer.php?view_id=80&amp;clip_id=24930</a> (last visited Aug. 22, 2023).

19	Texas House of Representatives, <i>88<sup>th</sup> Legislative Session (Part I)</i> (May 22, 2023), <a href="https://tlchouse.granicus.com/MediaPlayer.php?view_id=80&amp;clip_id=24934">https://tlchouse.granicus.com/MediaPlayer.php?view_id=80&amp;clip_id=24934</a> (last visited Aug. 22, 2023).
20	Texas Senate, <i>Senate Session (Part II)</i> (May 25, 2023), <a href="https://tlcsenate.granicus.com/MediaPlayer.php?view_id=53&amp;clip_id=18121">https://tlcsenate.granicus.com/MediaPlayer.php?view_id=53&amp;clip_id=18121</a> (last visited Aug. 22, 2023).
21	Mark Lungariello, “Video of drag queen gyrating in front of child has Texas pols pushing for legislative action”, NY POST (Oct. 18, 2022, 8:06 PM), <i>available at</i> <a href="https://nypost.com/2022/10/18/video-of-drag-queen-gyrating-next-to-child-sparks-backlash/">https://nypost.com/2022/10/18/video-of-drag-queen-gyrating-next-to-child-sparks-backlash/</a> (last visited Aug. 22, 2023).
22	Robert Downen, “How Texas Activists Turned Drag Events Into Fodder for Outrage”, TEX. TRIBUNE (Feb. 24, 2023, 5:00 A.M.), <i>available at</i> <a href="https://www.texastribune.org/2023/02/24/texas-drag-protests-children/">https://www.texastribune.org/2023/02/24/texas-drag-protests-children/</a> (last visited Aug. 22, 2023).
23	Greg Abbott (@GregAbbott_TX), TWITTER (June 24, 2023, 11:03 PM), <a href="https://twitter.com/gregabbott_tx/status/1672817859729162240?s=12&amp;t=PdsS2XI_vKHecU3T2VPeyw">https://twitter.com/gregabbott_tx/status/1672817859729162240?s=12&amp;t=PdsS2XI_vKHecU3T2VPeyw</a> (last visited Aug. 22, 2023).
24	Lieutenant Governor of Texas Dan Patrick, “Lt. Gov. Patrick Announces Top 30 Priorities for the 2023 Legislative Session” (Feb. 13, 2023), <i>available at</i> <a href="https://www.ltgov.texas.gov/2023/02/13/lt-gov-dan-patrick-announces-top-30-priorities-for-the-2023-legislative-session/">https://www.ltgov.texas.gov/2023/02/13/lt-gov-dan-patrick-announces-top-30-priorities-for-the-2023-legislative-session/</a> (last visited Aug. 22, 2023).
25	Bryan Hughes, FACEBOOK, (Mar. 23, 2023, 5:48 PM), <a href="https://www.facebook.com/BryanHughesTX/posts/pfbid0LBAWQr7km6fSGGtZrr8nbL8J5xKSBxLhocbMhlmfcVfRVEpjGMj5euq26Fy7ECHbl">https://www.facebook.com/BryanHughesTX/posts/pfbid0LBAWQr7km6fSGGtZrr8nbL8J5xKSBxLhocbMhlmfcVfRVEpjGMj5euq26Fy7ECHbl</a> (last visited Aug. 22, 2023).
26	Lieutenant Governor of Texas Dan Patrick, “Statement On The Adoption Of Conference Committee Report For Senate Bill 12, Banning Children’s Exposure To Drag Shows” (May 28, 2023), <i>available at</i> <a href="https://www.ltgov.texas.gov/2023/05/28/statement-on-the-adoption-of-conference-committee-report-for-senate-bill-12-banning-childrens-exposure-to-drag-shows/">https://www.ltgov.texas.gov/2023/05/28/statement-on-the-adoption-of-conference-committee-report-for-senate-bill-12-banning-childrens-exposure-to-drag-shows/</a> (last visited Aug. 22, 2023).

27	Matt Shaheen (@MattShaheen), TWITTER, (June 8, 2023, 7:48 AM), <a href="https://twitter.com/MattShaheen/status/1666789387005222912">https://twitter.com/MattShaheen/status/1666789387005222912</a> (last visited Aug. 22, 2023).
28	Caroline Harris (@CarolineForTX), TWITTER, (May 22, 2023, 4:09 PM), <a href="https://twitter.com/carolinefortx/status/1660754742639837184?s=12&amp;t=PdsS2XI_vKHecU3T2VPeyw">https://twitter.com/carolinefortx/status/1660754742639837184?s=12&amp;t=PdsS2XI_vKHecU3T2VPeyw</a> (last visited Aug. 22, 2023).
29	Carrie Isaac (@CarrieIsaac), TWITTER, (May 19, 2023, 11:11 PM) <a href="https://twitter.com/carrieisaac/status/1659773848676450304?s=12&amp;t=PdsS2XI_vKHecU3T2VPeyw">https://twitter.com/carrieisaac/status/1659773848676450304?s=12&amp;t=PdsS2XI_vKHecU3T2VPeyw</a> (last visited Aug. 22, 2023).

Pursuant to 28 U.S.C. § 1764, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23<sup>rd</sup> day of August 2023, in Houston, Texas.

  
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Charelle Lett